

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

JOHN FRANKLIN

Plaintiff

V.

BRYAN DOYLE and DWAYNE
JOHNSON in their individual capacities,
JEFFERSON COUNTY, and G. MITCH
WOODS, SHERIFF OF JEFFERSON
COUNTY, in his official capacity,

Defendants

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CIVIL ACTION NO.

1:09-cv-00931

JURY

PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS

Plaintiff respectfully submits the following proposed questions for the Court's voir dire of the jury panel.

PRIOR KNOWLEDGE

1. Please raise your hand if you heard anything about this case prior to coming to court this morning.
 - a. What have you heard?
 - b. From whom?
2. Please raise your hand if you are acquainted with the Plaintiff, Defendants, or any witness in this case.
 - John Franklin
 - Lieutenant Roger Clark
 - Bryan Doyle
 - Dwayne Johnson
 - Sheriff Mitch Woods
 - Captain Danny Walker
 - Officer Erik Boman
 - Officer Mike Hebert
 - Officer Brandon Palmer
 - Officer Santricia Renfro

- Officer Raymond K. Sellers
 - Officer Cory Davis
 - Officer Jeannette Dotson
 - Officer Glen Holmes
 - Officer Kevin Wolf
 - Officer Shawn Gallandar
 - Morgan R. Brown
 - Monica Theriot
 - Dr. Edward Gripon
 - Betty Burton Hartman
 - Chad Hartman
3. Please raise your hand if you know any of the attorneys who are here.
 4. Please raise your hand if you have heard of the Texas Civil Rights Project.
 - a. What have you heard?

LITIGATION

5. Please raise your hand if you do not approve of some types of lawsuits.
 - a. What are your feelings about civil rights litigation?
 - b. How do you feel about being a juror in a civil rights case?
6. Please raise your hand if you have ever served on a jury before.
 - a. What sort of case was it?
 - b. What was the outcome of the case?

JAILS

7. Please raise your hand if you would have trouble voting in favor of a person who was in jail, and later sued one of the correctional officers in the jail?
 - a. If yes: why?
8. Please raise your hand if you, or any family members or close friends, have ever worked for a jail facility.
 - a. Who? What relationship is this person to you?
 - b. What was their position there?

- c. When did they work there?
 - d. How long did they work there?
 - e. If they are no longer working at the jail, do you know why they left?
 - f. How do you feel about someone suing a correctional officer?
9. Please raise your hand if you, or any family members or close friends, have ever worked in law enforcement.
- a. Who? What is there relationship to you?
 - b. What is/was their position?
 - c. When did they work there?
 - d. How do you feel about someone suing a correctional officer?

DRUG ADDICTION

10. Please raise your hand if you would have trouble voting in favor of a person struggling with drug addiction.
- a. If yes: why?
11. Please raise your hand if you would have trouble awarding damages to a person struggling with an addiction.
- a. If yes: why?

TASERS

12. Please raise your hand if you know anyone who has been tasered.
- a. If yes: What was their experience?
13. Please raise your hand if you would have trouble awarding damages to a person who was tasered, if he felt pain but did not have long term injuries.
- a. If yes: why?

Dated: July 30, 2012.

Respectfully submitted,

/s/ Brian McGiverin

Brian McGiverin

Texas Bar No. 24067760

Scott Medlock

Texas Bar No. 24044783

James C. Harrington

Texas Bar No. 09048500

TEXAS CIVIL RIGHTS PROJECT

1405 Montopolis Drive

Austin, Texas 78741

Tel. (512) 474-5073

Fax (512) 474-0726

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been served on all counsel of record through the Electronic Case Files System of the Eastern District of Texas.

/s/ Brian McGiverin

Brian McGiverin